

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SHARON BOST, in her individual)	
capacity and as Personal)	
Representative of the ESTATE OF)	
FATIMA NEAL,)	
)	Case No. 1:15-cv-03278-ELH
Plaintiff,)	
v.)	Judge Ellen L. Hollander
)	
WEXFORD HEALTH SOURCES, INC., <i>et al.</i> ,)	JURY TRIAL DEMANDED
)	
Defendants.)	
)	
)	

PLAINTIFF'S EXHIBIT LIST

Exhibit No.	Description	Filed Under Seal?
1	2013 Performance Appraisal Form of Dr. Getachew Afre	
2	Jan. 2013 Utilization Management Presentation from Maryland Business Performance Action Meeting	
3	2014 Performance Appraisal Form of Dr. Getachew Afre	
4	2012 Central Region Baltimore Annual Performance Improvement Report	
5	2007-2017 Death Logs	Yes
6	11.30.2012 Monthly CQI Site Committee Report	
7	01.31.2013 Monthly CQI Site Committee Report for MCIW, EPRU, and SMPRU	
8	01.18.2013 CAP regarding Patient M.C.M.	
9	06.26.2013 CAP regarding Patient M.G.	
10	06.29.2013 CAP regarding Patient T.L.	
11	06.07.2013 CAP regarding Patient A.C-B.	
12	11.06.2012 CAP regarding Patient C.R.	
13	11.01.2012 Baltimore Pretrial CAP Response	
14	Deposition of Sharon Baucom, M.D.	
15	Deposition of Robert Smith, M.D.	

16	Deposition of Alfred Joshua, M.D.	
17	Deposition of Christy Somner	
18	01.12.2021 Deposition of Andria Wiggins Graham	
19	Deposition of Wendy Riccitelli	
20	Deposition of Mariann Forkgen McKee	
21	Deposition of Donna James	
22	12.22.2020 Deposition of Jocelyn El-Sayed, M.D.	
23	10.13.2016 Deposition of Karen McNulty	
24	Deposition of Kara Hope	
25	10.17.2016 Deposition of Najma Jamal	
26	Deposition of Anike Ajayi	
27	12.20.2016 Deposition of Oby Atta	
28	10.26.2016 Deposition of Jocelyn El-Sayed	
29	01.15.2021 Deposition of Getachew Afre, M.D.	
30	Deposition of Nicholas Little	
31	Deposition of Asresahegn Getachew, M.D.	
32	Deposition of Neil Schwartz, M.D.	
33	Deposition of Thomas Fowlkes, M.D.	
34	01.21.2021 Deposition of Isaias Tessema, M.D.	
35	Deposition of Stacey Scott	
36	Deposition of Neil Fisher	
37	02.22.2017 Deposition of Isaias Tessema, M.D.	
38	10.21.2016 Deposition of Getachew Afre, M.D.	
39	Deposition of Laura Pedelty, M.D.	
40	October 2012 Email Correspondence from Isaias Tessema, Mariann Forkgen, Sharon Baucom, and Dereje Tesfaye	
41	April 2013 Email Correspondence from Donna James and Mariann Forkgen	
42	August 2012 Email Correspondence from Asresahegn Getachew and Isaias Tessema	
43	10.01.2012 Email Correspondence from Fasil Wubu, Stacey Scott, Mariann Forkgen, and Christy Somner	
44	10.31.2013 and 11.01.2013 Email Correspondence from Asresahegn Getachew, Getachew Afre, and Isaias Tessema	
45	07.11.2013 Email Correspondence from Isaias Tessema, Fasil Wubu, and Getachew Asresahegn	
46	11.04.2012 Email Correspondence between Kara Hope and Stacey Shumway	
47	02.20.2013 Email Correspondence from Mariann Forkgen and Donna James	
48	Dr. Harrington Expert Report and CV	
49	Dr. Keller Expert Report and CV	
50	Dr. Shwartz Expert Report	
51	Dr. Pytel Expert Report and CV	

52	Dr. Fowlkes Expert Monell Report	
53	Dr. Keller Expert Rebuttal Report	
54	Dr. Pedelty Expert Supplement Report	
55	Neal Health Assessment	
56	Neal John Hopkins Hospital Medical Records	
57	Images of Fatima Neal's Brain	
58	01.23.2013 Monthly CQI Report	
59	Wexford's Technical Proposal for Inmate Medical Health Care and Utilization Services for MD DPSCS	
60	08.16.2012 DPSCS Monthly Regional Medical Advisory Council Meeting Minutes	
61	12.21.2012 Quarterly Regional Multivendor CQI Meeting Minutes	
62	10.26.2012 Hagerstown Monthly CQI Committee Report	
63	10.25.2012 Baltimore Monthly CQI Committee Report	
64	03.28.2013 Monthly CQI Committee Report	
65	11.29.2012 Baltimore Monthly CQI Committee Report	
66	04.25.2013 Jessup Monthly CQI Committee Report	
67	02.19.2013 NBCI and WCI Monthly CQI Committee Report	
68	02.20.2013 MCIJ/PRU/CMCF Monthly CQI Committee Report	
69	01.23.2013 MCIJ/PRU/CMCF Monthly CQI Committee Report	
70	01.24.2013 Jessup Monthly CQI Committee Report	
71	August and October 2012 Email Correspondence from Isaias Tessema, Mariann Forkgen, and Sharon Baucom	
72	12.20.2012 Email Correspondence from Dr. Smith, Luka Getnet, and Christina Oliyide	
73	01.04.2013 Email Correspondence from Donna James to Joe Ebbitt, Amy Groszkiewicz, Asresahegn Getachew, and Mariann Forkgen	
74	Excerpts of Deposition of Neil Fisher, M.D. in Vaughn v. Griffin	
75	07.23.2012 Email Correspondence from Donna James	
76	08.07.2012-08.08.2012 Email Correspondence between Tracy Scott and Erik Laskowitz	
77	07.28.2014 Baltimore Detention Monthly CQI Committee Report	
78	09.29.2014 Baltimore Detention Monthly CQI Committee Report	

79	Medical Records of Patient C.R.	Yes
80	Excerpt of 2012 Annual Report - "IV. Emergency Room Visit Reduction Program"	
81	Wexford Utilization Management Policies and Procedures for Maryland	
82	Maryland DPSCS Utilization Management Policies and Procedures	
83	Second Best and Final Offer Financial Proposal for Inmate Medical Health Care and Utilization Services for MD DPSCS	
84	Maryland Office of Inmate Health Services Chronic Disease Management Manual	
85	2005 Contract between Wexford and MD DPSCS for Utilization Management Services	
86	April 2021 DOJ Report on Mortality in Local Jails 2000-2018	
87	April 2021 DOJ Report on Mortality in State and Federal Prisons 2001-2018	
88	Maryland Department of Public Safety and Correctional Facility Annual Average Daily Population Report	
89	October 2018 Lippert v. Godinez Statewide Summary Report Including Review of Statewide Leadership and Overview of Major Services Report of the 2nd Court Appointed Expert	
90	09.05.2006 Clark County, Washington Medical Services for Detainees	
91	Wexford Health Sources MAC Meeting Minutes	
92	New Mexico Corrections Department Medical Audit	
93	Excerpts from Mississippi's FOIA Response	
94	Declaration of Rachel Brady	
95	Wexford Analysis of Preventable ER Runs, 2007-2017	
96	Wexford Response to P's 2nd ROGs	
97	10.23.2012 Medical Record	Yes
98	03.07.2017 Deposition of Natalie Saracino	
99	Natalie Saracino Letter	
100	Christina Sexton Letter	
101	Monica Brown Letter	
102	Kelly Frye Letter	
103	Criminal Investigation Report on Fatima Neal's Death	
104	02.15.2017 Deposition of Carolyn Murray	
105	Autopsy Report for Fatima Neal	Yes
106	Affidavit of Dr. Theodore King, Jr. Affidavit	
107	Dr. Nathaniel Evans Expert Report	

108	Dr. Laura Pedelty Expert Report	
109	Fatima Neal Medical Records	Yes
110	Declaration of Kelly Frye	
111	Post 83 Logbook	
112	11.01.2012 Medical Record	Yes
113	Declaration of Kiearra Blair	
114	Declaration of Natalie Saracino	
115	Methadone Logs	Yes
116	Dr. Nathaniel Evans Supplemental Expert Report	
117	Dr. Laura Pedelty Supplemental Expert Report	
118	Dr. Peter Pytel Supplemental Expert Report	
119	07.19.2017 Deposition of Peter Pytel, MD	
120	Carolyn Murray Memorandum to BCDC Administrators	
121	Declaration of Mary Betch	
122	Donetta Bennett Inmate Statement	
123	Carolyn Murray Email to BCDC Administrators	
124	Post-Mortem Report of Fatima Neal	
125	Najma Jamal Time Record	Yes
126	Anike Ajayi Time Record	Yes
127	M. Aubrey Muse Inmate Statement	
128	Highlighted Autopopulated Medical Records	Yes
129	11.04.2012 Medical Record by Najma Jamal	Yes
130	11.04.2012 Medical Record by Oby Atta	Yes
131	Baltimore Fire Department Paramedics Report	Yes
132	01.23.2017 Deposition of Bonnie Plimack	
133	Plimack Death Review	Yes
134	Deposition of Brent Harris, M.D.	
135	Declaration of Andrew Garden	
136	Monica Brown Inmate Statement	
137	09.14.2016 Deposition of Sharon Bost	
138	Wexford and DPSCS Inmate Medical Health Care and Utilization Services Contract and Request for Proposals	
139	Oct. 2012 Monthly CQI Site Committee Report	
140	11.09.2016 Deposition of Andria Wiggins Graham	
141	Deposition of Ebere Ohaneje	
142	07.26.2017 Deposition of Karen McNulty	
143	09.19.2012 Email Correspondence from Asresahegn Getachew and Donna James	
144	12.21.2012 Quarterly Regional Multivendor CQI Meeting Minutes	
145	01.31.2013 Monthly CQI Site Committee Report	
146	Medical Records of Patient F.R., part 1	
147	Medical Records of Patient F.R., part 2	

148	Correspondence and Mortality & Morbidity Meeting Minutes	
Group 1	Utilization Management Reports	

CERTIFICATE OF SERVICE

I, Sarah Grady, an attorney, certify that on November 24, 2021, I caused the foregoing exhibit list to be filed via the Court's CM/ECF electronic filing system, which effected service on all counsel of record.

/s/ Sarah Grady
One of Plaintiff's Attorneys